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Via ECF

Hon. Paul G. Gardephe, District Judge
United States District Court for the
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

MEMO ENDORSED

The Application is granted.

SO ORDERED:



Paul G. Gardephe, U.S.D.J.

Dated: July 7, 2022

Re: USA v. Rose (Jelani Wray), Case No. 19-cr-00789-PGG-2

Dear Judge Gardephe:

On April 8, 2022, the Court sentenced my client, Jelani Wray, to seven years' incarceration, and ordered that he surrender to begin serving his sentence on July 8, 2022. I respectfully request a 60-day extension of Mr. Wray's time to surrender, so that he can begin serving the sentence on September 8th. I have spoken with AUSA Mathew Andrews, who consents to this application on behalf of the government.

As the Court may recall, Mr. Wray's wife was six weeks pregnant at the time of sentencing, with a high-risk pregnancy. In 2021, she had suffered four miscarriages and two surgical procedures. Following Mr. Wray's sentencing, the couple learned that she was pregnant with twins but that one of the babies did not survive, which complicates the pregnancy even further. (See attached letter from his wife's (Ms. Jackson's) doctor). In addition, in the last week, Ms. Jackson developed a hard mass in her right armpit. (See attached photograph.) She went to the doctor on July 2, and, in part because of Ms. Jackson's family history of breast cancer, the doctor ordered an ultrasound examination for today at Lenox Hill and a biopsy of the mass. Her next appointment is on July 23 and, assuming she receives clearance, the biopsy can then be performed. Mr. Wray is also in the midst of helping Ms. Jackson move from Brooklyn to New Jersey, so she can be closer to family and the prison where Mr. Wray is scheduled to report.

Mr. Wray requests this short delay in surrendering so that he can help his wife deal with each of these situations and reduce the chances that the present cancer scare and move further complicate her pregnancy. In addition, as the Court may recall, Mr. Wray is the primary caregiver for his uncle, who is recovering from his cancer removal surgery last month and is due for a critical follow up appointment and CT scan on August 10 to monitor a cyst on his pancreas that was first identified during his last doctor's visit.

Page 2 of 2

Thank you for your attention to this application.

Respectfully submitted,

/s/ Joshua D. Liston
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